

July 20, 2020

Via ECF

Honorable Peggy Kuo, U.S.M.J.
U.S. District Court Eastern District of New York
U.S. Courthouse
Room 1207S
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Gill v. Jus Broadcasting Corp. et al. Case No. 1:19-cv-4216 (ILG)(PK)

Dear Magistrate Judge Kuo:

I annex Plaintiff's Proposed Discovery Plan/Scheduling Order. Mr. Batista and I have spoken and are unable to agree on the dates for the conclusion of all discovery. It is Plaintiff's position that this matter has been ongoing for quite some time. Plaintiff's discovery was propounded in early February. Plaintiff's Motion to compel more specific answers to Plaintiff's Interrogatories and Document Demand is now pending before the Court. It is Plaintiff's position that Defendants must begin to focus their attention on this matter and start providing the documents requested. There is no reason that the timeframe set forth in Plaintiff's proposed Discovery Plan/Scheduling Order should pose an unreasonable burden on the Defendants.

Mr. Batista will shortly submit his version to the Court.

Thank you for your attention and courtesies.

Respectfully yours,

LAW OFFICES OF ALAN R. ACKERMAN

ALAN R. ACKERMAN, ESQ.

ARA/bc Enclosure

cc: Kashmir Gill

Paul Batista, Esq.

BY: